

- 1.O** (a) Did you observe opaque smoke emitted from a smokestack (dark enough to obscure anything behind the plume)? Yes:___ No:___
If yes, which process line (be specific, i.e., boiler No. 4)? _____
- (b) Is the air pollution control equipment out of service? Yes:___ No:___
If yes, when will it be back on line? _____
- 2.OP** Did you smell any strong odors? Yes:___ No:___
If yes, from what process? _____ What chemicals (i.e., solvents) were causing the odors? _____ Is the process controlled by air pollution control equipment? _____
- 3.I** Has the facility added any processes which emit air pollutants or expanded any pre-existing air-pollution emitting processes in the last two years? Yes:___ No:___
If yes, what type of process was added? _____
Did the facility obtain a state air permit? _____
- 4.I** Does the facility operate a degreaser(s) that uses one of the following cleaning solvents:
- | | | |
|---------------------|---------------------|-------------------|
| Methylenechloride | Perchloroethylene | Trichloroethylene |
| 111-Trichloroethane | Carbontetrachloride | Chloroform |
- If yes, has the facility submitted an initial notification and a notification of compliance to the EPA? _____
- 5.I** (a) Does the facility have any diesel or electric generators? Yes:___ No:___
- (b) Were any of these generators operated for more than 300 hours in the last calendar year?

EPCRA N313 (Spill Notification/Chemical Inventory) and CAA 112(r) Risk Management Plans

- 1.I** Has the facility experienced any accidental releases above the Reportable Quantity (RQ) within the last three years? Yes:___ No:___
If yes, provide the name of the chemical released, the quantity and the date: _____
-
- 2.I** Does the facility have on-site at any time during the calendar year a) 10,000 pounds or more of any hazardous chemical requiring an MSDS or b) greater than 500 pounds or the chemical-specific Threshold Planning Quantity (TPQ), whichever is lower, of a listed Extremely Hazardous Substance (EHS)? Yes:___ No:___
- 3.I** If yes, have Tier II chemical inventory forms been filed annually with the fire department and local/state planning authorities? _____

- 4.I** Does the facility have more than a threshold quantity of a listed chemical in any individual process (including storage) requiring preparation of a Risk Management Plan?
Yes:___ No:___
- 5.1** If yes, has the facility submitted an RMP summary to EPA via the Internet?

EPCRA Section 313 (Toxic Release Inventory)

- 1.I** Does the facility manufacture, process, or otherwise use any toxic chemicals in a quantity greater than 10,000 pounds per year? Yes:___ No:___
- 2.I** Does the facility manufacture, process, or otherwise use any Persistent Bioaccumulative Toxic (PBT) chemicals in a quantity greater than 10 or 100 pounds per year (0.1 gram for Dioxin)? Yes:___ No:___
- 3.I** Has the facility submitted any toxic chemical release forms (Form R or Form A) to EPA? Yes:___ No:___

FIFRA

- 1.I** Does the facility manufacture, distribute, repack, relabel, store or use pesticides? (Product which would be considered pesticides includes disinfectants, sterilizers, germicides,

algicides, virucides, swimming pool compounds, insecticides, fungicides, herbicides, etc.)
 Yes:___ No:___

2.I If yes, does the label bear an EPA registration and establishment number? _____

Lead Paint:

Title X, Section 1018 Real Estate Notification & Disclosure Rule and TSCA 406(b) Pre-Renovation Education Rule

1.I Does the facility lease pre-1978 residential property? Yes:___ No:___
 If no, skip rest of questions in this section
 If yes, please identify the owner of the property(ies)? _____

2.I How many pre-1978 units does the facility lease? _____

3.I Do some of the units have at least one bedroom? (note studios are exempt from Section 1018) _____

4.1 Has the facility conducted any lead testing such as risk assessments or lead inspections at the property(ies)? Yes:___ No:___
 If yes, explain (when? # of units?) _____

5.I Has the facility conducted any abatement at the property(ies)? Yes:___ No:___
 If yes, explain (when? # of units?) _____

6.I Has the facility conducted any recent renovation work at the properties? Yes:___ No:___
 If yes, explain (when? describe activity?) _____

RCRA

1.I Does the facility generate or otherwise handle hazardous waste? Yes:___ No:___
 If yes, describe the types of hazardous waste generated/handled, and state whether it is generated on-site or received from off-site. _____

2.OP Do you see any waste stored in containers, drums, tanks, pails, or dumpsters? Note the

approximate quantity of waste, and its location: _____

- 3.OP** Are there any containers or tanks of hazardous waste that are open or in poor condition (leaking, corroded, etc.)? Yes:___ No:___
 If yes, describe waste (e.g., liquid, sludge, etc.), indicate markings on containers/tanks and the container/tank location(s): _____

- 4.OP** Is there any evidence of spills or leaks or dumping to the ground, pits or lagoons? Yes:___ No:___
 If yes, note location and extent of release: _____

- 5.I** Does the facility operate a boiler or industrial furnace? Has there been any incineration of hazardous waste on-site? Yes:___ No:___
 If yes, what type of hazardous waste, and is this an ongoing operation? _____

Site Security (Physical)

- 1.O** Initially, upon your arrival at the facility, did the site boundaries appear secure? Yes:___ No:___
 If No, describe and take photos of problem area(s). _____

- 2.O** If the outer perimeter (i.e., fence-line) appeared unsecured, are there interior “active portions” of the facility with security systems in place? (**Note:** Active portions of a facility include areas such as process areas, storage areas, and labs where hazardous materials are present.) Yes:___ No:___ N/A:___
- 3.O** Could uncontrolled access to the site provide direct access to hazardous materials, processes using hazardous materials, and/or their support systems? Yes:___ No:___ N/A:___
- 4.O** Were warning signs posted along the fence-line and/or at access points to “active portions” of the facility? Yes:___ No:___ N/A:___
- 5.I** Does the facility maintain a 24-hour surveillance program? Yes:___ No:___
- 6.I** Does the facility have a written Site Security Plan? (**Note:** The Site Security Plan could be included as part of another document such as a Site Safety Plan.) Yes:___ No:___
- 7.I** Is site security included in the facility’s personnel training programs? Yes:___ No:___

SPCC

- 1.I** What is the above ground and below ground oil storage capacity of the facility? (Identify the storage capacity at the facility not just the actual amount of oil stored. In calculating the above ground storage capacity, you should also identify any oil stored in containers of 55 gallons or more, including transformers).

_____ above, _____ below

- 2.I** If the facility stores more than 1,320 gallons above ground (in any number of tanks, drums, transformers, etc) **or** more than 42,000 gallons belowground (not already regulated by OUST at 40 CFR Parts 280 or 281), does the facility have a P.E. certified SPCC (Spill Prevention, Control, and Countermeasure) Plan? Yes:___ No:___

Date of Plan:_____

Certifying PE Number:_____ from State of:_____

TSCA PCB

- 1.OI** Is there any evidence of liquid-filled electrical equipment that may contain PCBs?

Yes:___ No:___

If "yes," describe type of equipment:_____

- 2.IP** If the above equipment is considered to contain PCBs, what was the basis for this determination:

based on- marking with "Large PCB Mark"? Yes:___ No:___

based on- equipment Nameplate? Yes:___ No:___

based on- information from facility rep.? Yes:___ No:___

- 3.OP** Is there any evidence of spills or leaks from transformers, capacitors, or other liquid-filled electrical equipment that may contain PCBs? Yes:___ No:___

If "yes," describe type of equipment and spill or leak _____

- 4.OP** Are there any PCB items (equipment, drums of waste or other containers) in storage for disposal? Yes:___ No:___

Where are these items being stored, and what is their condition? _____

TSCA Core

- 1.I** Does the facility manufacture (synthesize anew) any chemical substances in any amount?

Yes:___ No:___

If yes, in simple terms, what chemical(s) do they make? _____

- 2.I** Does the facility import any chemical substances into the United States? (Company is "Importer of Record") Yes:___ No:___
If yes, what chemicals? _____

UST

- 1.I** Does the facility store in USTs motor fuels, waste oils, and/or hazardous substances?
 Yes:___ No:___ (Note: USTs containing heating fuels for on-site heating purposes are
 exempted from RCRA UST.)

If Yes, ask:

- 2.I** Are the USTs registered with the state? Yes:____ No:____
(Each state keeps notification data for USTs)
- 3.I** Is some form of leak detection in use for the UST system's tank and associated piping)?
Yes:____ No:____
- 4.I** Are state registration and leak detection records available for each tank system?
Yes:____ No:____

Water

A. WASTE WATER (PROCESS, SANITARY, COOLING WATER)

- 1. P** Does the facility use water in its manufacturing processes? Yes No
- I a** Does the facility discharge wastewater (process, sanitary, cooling, etc.) into a (circle one)
surface water *combined municipal sewer system* *subsurface system*
separate municipal sewer system
- I b** Are all wastewater discharges covered by a permit? Yes No
If No, explain _____
What type(s) of permits does the facility have to cover wastewater discharges?
(circle all that apply) *Pre-treatment (POTW)* *none*
Individual NPDES *General NPDES*
- 2.a. I** Has the facility expanded its production or wastewater flow, or changed its processes, since the issuance of its most recent permit(s)? Yes No
If yes, explain: _____
- b.O** Did you observe any wastewater outfalls? Yes No
If so, explain any discoloration, steam, oil sheen, or odor you observed?

3. P Does the facility have floor drains?

Yes No

If yes -

a) Are materials stored in a manner that leaks or spills could enter the floor drains? _____

b) Are materials dumped down the floor drains? _____

I c) Where do the floor drains discharge on site(circle all that apply)

treatment facility municipal sewer (POTW) subsurface system
storm drain surface water

4. Does the facility treat its process and/or sanitary wastewater prior to discharge? *Yes No*
 If yes -

OP a) Is the treatment equipment operational, clean, and well maintained? _____

OP b) Is the discharge free of solids, color, and odor? _____

B. STORM WATER

1. O Are there catch basins, drains, culverts, ditches, etc. on the property intended to convey storm water? *Yes No*

If yes -

Is the storm water conveyed to a (circle all that apply)

treatment facility combined sewer separate storm sewer
separate sanitary sewer surface water

2. I Are all storm-water discharges covered by a permit? *Yes No*

If No, explain _____

What type of permit does the facility have to cover storm water discharges?

general storm water permit individual storm water permit none

3. O Are materials stored outside? *Yes No*

If yes -

a) Are materials

stored in sealed containers, under tarps or roofs

open to contact with precipitation

b) Are outside material handling/storage areas clean and kept in a manner to prevent contamination of runoff? *Yes No*

Wetlands

1.O Within view, are there a) streams, ponds or other water bodies; b) vegetated areas with standing water; or c) areas with mucky, peaty, or saturated (squishy) soils? If yes, have any of these areas been disturbed by waste/refuse disposal, storage of materials, ditching, or filling? If yes, briefly describe:

- 2.I If yes to both "Observable" questions, does facility have a federal CWA section 404 permit, or any state or local permit authorizing the activity(ies) observed?

Underground Injection Control (UIC)
Subsurface Wastewater Disposal

- 1.A. [I] Does the facility discharge fluid wastes to drains, plumbing, or drainage systems connected to a subsurface wastewater disposal system(s) listed below? Yes: ___ No: ___
 If "yes," circle discharged fluid waste type(s) in list below.
 If "yes," circle subsurface wastewater disposal system type(s) in list below.

- 1.B. [I] Does the facility have a state or local permit authorizing the subsurface wastewater disposal system(s)? Yes:___ No___

Subsurface Sewage Disposal

- 2.A. [I] Does the facility have an onsite sewage disposal system(s) that serves more than 20 people per day? Yes:___ No___

- 2.B. [I] Does the facility have a state or local permit authorizing the onsite sewage disposal system(s)? Yes:___ No___

- 2.C. [I] Is the onsite sewage disposal system used to dispose of any fluid waste type(s) listed below? Yes:___ No___
 If "yes," circle discharged fluid waste type(s) in list below.

3. [O] Do you observe any floor drain(s) or surface drain(s) that can receive any of the fluid waste type(s) listed below? Yes:___ No___
 If "yes," check the discharged fluid waste type(s) in list below.

3. [I] If "yes", where does the facility drain(s) discharge: a. Municipal sewer?_____
 b. Subsurface disposal system type(s) listed below?_____ c. Unknown_____

Disposal System Type

dry well	septic system	cesspool	leach field	leach pit	leaching trench	disposal well
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Fluid Waste Type

Liquid Wastes Process Wastewater Non-Contact Cooling Water Boiler Blowdown Fluids Air Conditioning Fluids Heat Pump Fluids Other Waste _____	Wash Water, Spills or Storm Water from: * maintenance areas * hazardous material or waste storage areas * hazardous material or waste handling areas * process or manufacturing areas * fuel storage areas * areas prone to hazardous substance release
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CODES:**O - OBSERVABLE P - PROCESS I - INTERVIEW****Pollution Prevention (Optional)**

1.I Does your facility have a pollution prevention, toxics use reduction, or RCRA waste minimization program? Yes:___ No___

Would you be interested in finding out more about pollution prevention techniques?

Take a look at this brochure, and feel free to call any of the EPA, state, or other staff listed for more information.

ADDITIONAL COMMENTS

CONCLUSION

RECOMMENDATION FOR FOLLOW-UP

Forwarded to	Contact	Phone	Mail Code
Air-stationary	Denny Dart	918-1850	SEA
EPCRA 313	Juan Paez	918-1821	SEP
EPCRA (Non313)	Rose Toscano	918-1861	SEP
FIFRA	Wayne Toland	918-1852	SEA
Lead Paint	Molly Magoon	918-1848	SEP
RCRA	Ken Rota	918-1751	SER
Site Security	Jim Gaffey	918-1753	SEP
SPCC	Don Grant	918-1768	SEW

TSCA PCB	Marianne Milette	918-1854	SEP
TSCA Core	Rose Toscano	918-1861	SEA
UST	Bill Torrey	918-1311	HBO
WATER	Mike Fedak	918-1766	SEW
UIC	Dave Delaney	918-1614	CMU
WETLANDS	Denise Leonard	918-1719	SEE
RMP	Ray DiNardo	918-1804	SPP

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ADDENDUM ON WHEN TO REFER

AIR - Stationary Sources

Question 1: Refer the checklist any time you observe opaque smoke from the facility's stack. Excess opacity may be a sign of operational problems or an indication that the facility is not operating according to design specifications and/or air pollution permit requirements.

Question 2: Refer the checklist any time you sense odors from a process. The facility may be having trouble with its air pollution capture and/or destruction equipment or may not be following good engineering work practices.

Question 3: Refer the checklist if a facility has not obtained a state air permit for a new process or piece of air pollution control equipment. (EPA no longer writes air permits). Not all installations require a permit. Therefore, the air program will follow-up to determine if the new device required a permit.

Question 4: Refer the checklist if the facility answers "yes."

Question 5: Refer if answered "yes" to a & b

EPCRA (Chem. Inventory)

Refer if:

YES to question 1

YES to question 2 -- (question 3 must be completed)

EPCRA Section 313 (Toxic Release Inventory)

If answer to 1 or 2. is "yes," please refer.

FIFRA

If answer to Question 2 is "no," refer.

Lead Paint

Refer if answered "yes" to Question 1 and answer to Question 2 is greater than 10.

RCRA

Refer if:

(O) Answers to questions 3 or 4 are YES.

(P) Answer to questions 3 or 4 are YES.

(I) Answer to question 1 is that hazardous waste is received from off-site. (Acceptance of hazardous waste from off-site may indicate that a facility is an illegal TSDF.)

Answer to question 5 indicates that hazardous waste is burned on-site. (If waste oils alone are burned on-site, do not refer the checklist to RCRA.)

Site Security

Inspectors should refer if they have concerns about the site's physical security or about the site management's attitude towards security.

SPCC

If facility stores oil in quantities above thresholds mentioned in question and there is no SPCC plan, please refer.

TSCA PCB

If the answers to any question is "yes," please refer to the TSCA PCB Program.

TSCA CORE

If the answer to 1 or 2 is "yes," refer to TSCA.

UST

If the answer to Question 1 is "yes," and the answer(s) to any of questions 2, 3, or 4 is/are "no," please notify the OUST or send the office a copy of the checklist.

WATER

If the answer to

- A.1.b is **No / None**, refer to Water
- A.2 is **Yes**, refer to Water
- A.3.a is **Yes**, refer to Water
- A.3.b is **Yes**, refer to Water
- A.4.a is **No**, refer to Water
- A.4.b is **No**, refer to Water
- B.2 is **No / None**, refer to Water
- B.3.b is **None**, refer to Water
- If you observed an outfall that concerns you, refer to Water

WETLANDS

If "yes" to both Observable questions and "no" to Interview question (or facility cannot produce **federal CWA section 404 permit**), refer checklist to EPA Wetlands Program contact.

UIC

Refer to UIC Coordinator if:

1.A. is Yes	and	1.B. is No.
2.A. is Yes	and	2.B. is No.
2.C. is Yes		
3.[O] is Yes	and	3.[I] is b. or c.

ACRONYMS

AIR

CAA - Clean Air Act
 CEM/CEMS - Continuous Emission Monitoring/System
 CFC - Chlorofluorocarbon
 EER - Excess Emission Report
 HAP - Hazardous Air Pollutant
 NESHAPS - National Emission Standards for Hazardous Air Pollutants
 NSPS - New Source Performance Standards
 NSR - New Source (Pre-construction) Review
 PM - Particulate Matter
 RACT - Reasonably Available Control Technology
 RMP - Risk Management Plan
 SIP - State Implementation Plan
 VOC - Volatile Organic Compounds

EPCRA

EPCRA - Emergency Planning and Community Right-to-Know Act
 LEPC - Local Emergency Planning Committee
 SERC - State Emergency Response Commission
 TRI - Toxic Release Inventory

FIFRA

FIFRA - Federal Insecticide, Fungicide, and Rodenticide Act, as Amended
 EPA Reg. No. - EPA Registration Number (one for each pesticide)
 EPA Est. No. - EPA Establishment Number (where a pesticide is manufactured)

RCRA

RCRA - Resource Conservation and Recovery Act
 HSWA - Hazardous and Solid Waste Amendments
 TCLP - Toxicity Characteristic Leaching Procedure
 LDR or Land Ban - The Land Disposal Restrictions
 TSDF - Treatment, Storage and Disposal Facility
 LQG - Large Quantity Generator
 SQG - Small Quantity Generator
 BIF - Boiler and Industrial Furnace

TSCA/PCBs

TSCA - Toxic Substances Control Act
 PCBs - Polychlorinated biphenyls
 ML - Large PCB Mark

UST

UST - Underground Storage Tanks
 OUST - Office of UST

WETLAND

CWA - Clean Water Act

404 - specific section of the CWA regulating the discharge of dredged or fill material into waters of the U.S., including wetlands